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October 7, 2021

Claimant AMA Capital Management LLC shall file a supplemental letter by **October 15, 2021**, providing the basis for sealing its information in its filing and in Plaintiffs' filing in accordance with the three-part test in *Lugosch*. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). So Ordered.

VIA ECF

Honorable Lorna G. Schofield
United States District Court Judge **Dated: October 8, 2021**
Southern District of New York **New York, New York**
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Contant, et al. v. Bank of America Corp., et al., No. 17-cv-3139

Dear Judge Schofield,

This firm was recently retained as local counsel to claimant AMA Capital Management, LLC ("AMA") in the above-captioned matter. In accordance with the Court's September 16, 2021 Order (ECF 488), AMA is today filing its response (the "Letter Motion") to Class Counsel's request for review of AMA's claim submitted to the Court on September 23, 2021 (ECF 490).

Pursuant to Your Honor's Rule I.D.3, we write to request that the Court permit AMA to (a) file redacted versions of its Letter Motion and (b) file certain exhibits in connection with that Letter Motion under seal, specifically Exhibits 1, 2, 3, 4, 7, and 9.

We make this request for the same reasons stated in Class Counsel's September 23, 2021 letter requesting to seal their letter brief and exhibits under seal (ECF 489), namely, that parts of the Letter Motion contain trade secrets, banking information, and competitively sensitive information about AMA's business. Further to Your Honor's Rule I.D.3, AMA's counsel will file the unredacted version of the letter brief with proposed highlights and full set of corresponding exhibits under seal. Thereafter, Counsel will file a redacted version of the Letter Motion and a set of corresponding exhibits that includes placeholders for those proposed to be filed under seal on the record.

We will also serve the unredacted Letter Motion and full set of unsealed corresponding exhibits upon Class Counsel. Although we will use ECF to identify the parties and attorneys of record who should have access to the sealed documents, we have also included an appendix identifying those parties and attorneys here.

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Given the resurgence of COVID-19, we are not mailing courtesy copies to chambers of the documents we propose to file under seal. Please let us know if Your Honor would like us to email a courtesy copy to chambers and we will do so.

We thank Your Honor for the Court's time and attention to this matter.

Respectfully submitted,



Damian R. Cavaleri

cc: All Counsel of Record (by ECF)

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APPENDIX

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